

# Morgan Lewis

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**February 28, 2018**

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: CWC New Cayman Limited – Filer ID: 828789  
Annual CPNI Compliance Certification - CY 2017  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of CWC New Cayman Limited (the “Company”), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company’s calendar year 2017 CPNI Certification.

Respectfully submitted,

*/s/ Ulises R. Pin*

Ulises R. Pin

Counsel for CWC New Cayman Limited

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017.

**Date filed:** February 22, 2018

**NAME OF COMPANY COVERED BY THIS CERTIFICATION:**  
CWC NEW CAYMAN LIMITED

**Form 499 Filer ID:** 828789

**Name of signatory:** Gregor McNeil

**Title of signatory:** Director

I, Gregor McNeil, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules as to the telecommunications services provided by the Company that are regulated by the Commission. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

**SIGNED** \_\_\_\_\_



Name: Gregor McNeil  
Title: Director

**CWC NEW CAYMAN LIMITED**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

**CWC NEW CAYMAN LIMITED** (the “Company”) maintains CPNI in a variety of databases and record systems. Each of these systems is protected against unauthorized access. Consistent with the Commission’s rules, the Company uses, discloses, and permits access to CPNI without customer approval for the purposes of providing telecommunications services, billing and collecting for services rendered, protecting the Company’s rights and property, and providing customer information required by a Public Safety Answering Point.

The Company does not permit the use of CPNI for any marketing purposes whatsoever, and therefore does not collect opt-in or opt-out authorizations from customers for such use. The Company does not conduct sales and marketing campaigns that use customers’ CPNI. While the Company occasionally shares CPNI with third parties solely to provide services to its customers, the Company does not share, sell, lease or otherwise provide CPNI to any third party for the purposes of marketing any services. Records of all other contacts with the customer (written or oral) are maintained in customer’s account records for at least two years.

The Company has trained its personnel as to when they are and are not authorized to use or disclose CPNI, and the Company has an express disciplinary process in place. All Company personnel who have access to use of CPNI, receive training regarding prohibitions against the use or disclosure of CPNI. In particular, the Company’s employee handbook addresses the handling of CPNI. All of the Company’s employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by the Company. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI are subject to discipline, which may include termination.

The Company has implemented procedures whereby it will not provide CPNI without proper customer authentication on inbound telephone calls. The Company does not collect, use or maintain call detail information from its U.S. customers and does not provide online account access for any customers.

The Company has implemented procedures that conform with the relevant FCC rules to inform customers when their address changes. In addition, the Company has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years as required by the applicable FCC CPNI rules.